

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS AND WILLIAM
ZHANG, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and
DANIEL LARIMER,

Defendants.

Civ. No. 1:20-cv-02809-LAK

CLASS ACTION

CRYPTO ASSETS OPPORTUNITY FUND
LLC and JOHNNY HONG, Individually and
on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER,
DANIEL LARIMER, IAN GRIGG, and
BROCK PIERCE,

Defendants.

Civ. No.: 1:20-cv-3829-LAK

CLASS ACTION

**DECLARATION OF CAITLIN M. MOYNA IN SUPPORT PLAINTIFF'S *EX PARTE*
MOTION FOR AN ENLARGEMENT OF TIME FOR SERVICE**

I, Caitlin M. Moyna, declare as follows:

1. I am a Senior Counsel of Grant & Eisenhofer P.A. ("G&E"), 485 Lexington Avenue, New York, NY 10017, co-counsel for Crypto Assets Opportunity Fund LLC ("CAOF").
2. I submit this declaration in support of CAOF's motion pursuant to Rule 4(m) and Rule 6(b) of the Federal Rules of Civil Procedure for an order: (1) extending the time to serve the

summons, civil cover sheet, and complaint filed on May 18, 2020 1:20-cv-3829 (“Complaint”) on Defendant Brock Pierce until October 16, 2020 and (2) extending the time to serve the summons, civil cover sheet, and Complaint on Defendants Ian Grigg and Brendan Blumer until February 17, 2021.

3. Attached hereto as Exhibit 1 is a true and correct copy an email from Process Xpress Service to Toby Saviano, Senior Paralegal at Grant & Eisenhofer P.A., dated May 28, 2020, and explaining the results of Process Xpress Service’s investigation into Defendant Brock Pierce’s address in San Juan, Puerto Rico.

4. Attached hereto as Exhibit 2 is a true and correct copy of Defendant Brock Pierce’s 2020 Oklahoma Statement of Candidacy as an Independent Candidate for President of the United States, showing his residence address and campaign mailing address.

5. Attached hereto as Exhibit 3 are true and correct copies of emails from Jose Medina, a service manager at Covert Intelligence Group, to Toby Saviano, Senior Paralegal at Grant & Eisenhofer P.A., dated June 12, 2020, June 15, 2020, and August 17, 2020 explaining the results of attempts of service of the summons, complaint and civil cover sheet on Defendant Brock Pierce.

6. Attached hereto as Exhibit 4 is a true and correct copy of an email from Jesinette Breton, a process server at Covert Intelligence Group, to Toby Saviano, Senior Paralegal at Grant & Eisenhofer P.A., dated August 17, 2020, explaining the recent result of an attempt to serve the summons, civil cover sheet, and Complaint filed on May 18, 2020 on Defendant Brock Pierce at what Plaintiff believed was his campaign headquarters.

7. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiff’s Request for Waiver of the Service of the Summons and Complaint sent to Defendant Brock Pierce on August 14, 2020, by certified mail, with return receipt requested.

8. Attached hereto as Exhibit 6 is a true and correct copy of an invoice from Total Global Credit & Risk Solutions sent to Jenny Vatrengo, Esq., who represents Plaintiff in this action, dated August 14, 2020, evidencing engagement of a process server in Hong Kong to serve the summons and complaint on Brendan Blumer and Ian Grigg.

9. Attached hereto as Exhibit 7 is a true and correct copy of the following articles published about the Complaint that Plaintiff filed on May 18, 2020 (1:20-cv-3829):

- “Investors Sue Block.one Over Unregistered \$4B ICO,” Reenat Sinay, *Law360.com*, May 18, 2022;
- “Class action lawsuit filed against Block.one over allegations about its EOS initial coin offering,” Aislinn Keely, *The Block*, May 18, 2020;
- “Another Class Action Against Block.One Alleges Dirty Dealings During EOS ICO,” Kollen Post, *cointelegraph.com*, May 18, 2020;
- “Block.one Failed to Decentralize EOS, Argues New Securities Fraud Lawsuit,” Paddy Baker, *coindesk.com*, May 19, 2020;
- “Block.one Faces Another US Class-Action Lawsuit,” Arnab Shome, *financemagnates.com*, May 19, 2020;
- “Class action lawsuit against Block.one calls \$4B ICO ‘biggest of all crypto frauds,’” C. Sephton, *modernconsensus.com*, May 19, 2020;
- “Investors Bring Class Action Against Block.one Alleging Coin Offering Scam,” Kirsten Errick, *lawstreetmedia.com*, May 20, 2020;
- “Class action litigation launched against Block.one and EOS,” T. Skevington and M. Bacina, *bitsofblocks.io*, May 21, 2020;
- “Investors file class-action lawsuit against Block.one over its alleged ‘fraudulent scheme,’” Marivic Cabural Summers, *usaheald.com*, May 21, 2020; and
- “Grant & Eisenhofer to Lead Suit over \$4B Block.one ICO,” Reenat Sinay, *Law360.com*, August 5, 2020

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 17, 2020.

/s/ Caitlin M. Moyna
Caitlin M. Moyna